## AFFIDAVIT

Tung Xuan Le, being first duly sworn on oath, deposes and says:

- 1. I am President of LeTech Inc., a computer technology consulting firm in Alexandria, Virginia.
- 2. Bachelor of Science in Mechanical Engineering, minor in Computer Science, 1983, Catholic University of America, Washington, DC.
- 3. For the past sixteen years. I have worked as a professional computer scientist in airport computer simulation. In that time I have performed numerous simulation analyses for airspace, runway, gates, and terminal worldwide. Additionally, I am the developer of TotalAirportSim and was a member of the FAA's SIMMOD development team. I am very familiar with the structure of airport capacity and delay simulation models.
- 4. I have conducted a preliminary review of the TAAM simulation model runs and data used by the FAA in the Final Environmental Impact Statement for the project called the "O'Hare Modernization Program" ("OMP")..
- 5. FAA used as input to the program the year 2002 Terminal Area Forecast (TAF) and I was asked to give a professional expert opinion as to the length of time that would be necessary to re-run the TAAM program with either 2003 or 2004 TAF data as the inputs.
- 6. My opinion as to the length of time required for such an effort and the basis for my opinion is as follows:
  - A. In performing an airport analysis using an airport/runway simulation model, there are two major parts for development, 1) building the network and 2) building the input schedule.
  - B. In comparison of these two major parts mentioned above, the less complex part to build is the input schedule for a full airport simulation analysis.

- C. Assuming that a series of experiment with the 2003 or 2004 TAFs all uses exactly the same network, the only effort is to build a different input schedule for each experiment.
- D. In any one experiment (e.g., the use of the 2003 or the 2004 TAF), the effort to translate a new schedule to be useable with the network, should not take more than 20 business days and as little as 1 week in some cases, with the following assumptions:
  - The same analyst or someone comparable in expertise, in the tool and understanding of the dataset, performs the experiment.
  - The new schedule does not require any modification to the network. 2)
  - The new schedule, 2003 or 2004, is derived from the 2002 schedule 3). using cloning method, duplication and/or modification method or some other agreed upon method.
  - The same new schedule is used for all other experiments. 4).
- If any additional variations or modifications were necessary, the work could till 7. be done in the time frame I discussed if sufficient financial and manpower resources were assigned to the task.

Notary Public